

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK**

DESHAWN JACKSON, individually and on behalf
of all others similarly situated,

Plaintiff,

vs.

POM Recoveries, INC.,

Defendant.

Case No.: 1:17-cv-06118-ADS-AKT

NOTICE OF MOTION FOR RECONSIDERATION

PLEASE TAKE NOTICE THAT Plaintiff, DESHAWN JACKSON, will move before the Court, at the United States Courthouse for the Eastern District of New York, before the Honorable Arthur D. Spatt, United States District Judge, at the Alphone D'Amato United States Courthouse, 100 Federal Plaza, Central Islip, New York, 11722, at such time and date as the Court shall set, for an Order pursuant to Local Rule 6.3, Fed. R. Civ. Pro. 60 and 72, reconsidering the Order of Magistrate Judge Tomlinson dated March 28, 2018, which granted Defendant's motion for a protective Order – in part – against certain discovery demands served by Plaintiff, together with such other and further relief as this Court deems just, appropriate and proper.

Dated: Garden City, New York
April 2, 2018

Respectfully submitted,

BARSHAY SANDERS, PLLC
Attorneys for Plaintiff

By: *s/ Jonathan M. Cader*

Jonathan M. Cader, Esquire
David M. Barshay, Esquire
Craig B. Sanders, Esquire
100 Garden City Plaza, Suite 500
Garden City, New York 11530
Telephone: (516) 203-7600
Facsimile: (516) 706-5055
jcader@sanderslawpllc.com
dbarshay@barshaysanders.com
csanders@barshaysanders.com

To: Robert Arleo, Esq.
Michael Kohl, Esq.
Via ECF

CERTIFICATE OF SERVICE

The undersigned certifies that on this 4th day of April, 2018, a true and correct copy of the foregoing was served on all counsel of record *via* the Court's ECF service, with notice of case activity generated.

s/ Jonathan M. Cader